

NATIONAL PARK SERVICE

FINDING OF NO SIGNIFICANT IMPACT

Theodore Roosevelt Inaugural National Historic Site Master Plan Amendment

INTRODUCTION

The primary mission of the National Park Service, as derived from the Organic Act of 1916 and subsequent legislation, is to preserve unimpaired the natural and cultural resources and values of units of the national park system for the enjoyment, education, and inspiration of this and future generations. The National Park Service Strategic Plan, 2000-2005 summarizes its total mission as to preserve resources and serve the public. These are the organizing objectives of the Master Plan Amendment for Theodore Roosevelt Inaugural National Historic Site.

The Site

Congress established the Theodore Roosevelt Inaugural National Historic Site (NHS) via Public Law 89-708 on November 2, 1966. The purposes of the one-acre NHS are twofold: (1) to preserve the Ansley Wilcox House in Buffalo, NY, where Theodore Roosevelt became the 26th president of the United States on September 14, 1901; and (2) to provide opportunities for visitors to understand the historical events surrounding the inauguration, as well as the lasting significance of Theodore Roosevelt's life and presidency. The NHS is historically significant because it was in the library of the Ansley Wilcox House that TR took the oath of office following the assassination of President William McKinley. The Wilcox House is one of only five presidential inaugural sites located outside of Washington, D.C. and illustrates the peaceful transfer of power that is a hallmark of our democratic process.

The Foundation

The enabling legislation stipulates that operation of the NHS be supported by private funds. While the federal government owns the property, the Theodore Roosevelt Inaugural Site Foundation operates and manages the NHS through a cooperative agreement with the National Park Service (NPS). The Foundation has met the challenge of raising funds to operate the park from its inception.

In addition to raising funds for the initial restoration of the property, it was responsible for all management and operational costs of the NHS until 1980, when new legislation stipulated that the NPS contribute up to 2/3 of the annual operating budget. Since then, the Foundation has successfully managed the site and contributed its share of operating support, and from Fiscal Year 2000, at more than 50% of the total budget.

PURPOSE AND NEED FOR THE PLAN AMENDMENT

Theodore Roosevelt Inaugural NHS provides interpretive and educational programming for 15,000 to 20,000 visitors annually. In addition to supporting the interpretive functions, the Ansley Wilcox House serves as the headquarters for the Foundation and for a sizable core of active and talented volunteers. The mix of activities that take place in the single historic structure—administration, board meetings, volunteer projects, event preparation, lectures, exhibit viewing, guided tours, collection conservation, maintenance operations, children's school programs—presents certain programmatic and functional limitations. The limitations were identified in a "needs assessment" prepared by team members in November 2004 and were further examined during an on-site planning workshop. The needs assessment determined that an additional 4,300 square feet of interior space is required for the safe and efficient operation of the NHS. The guiding document currently in effect for the NHS, the 1967 Master Plan, did not anticipate these facility requirements and provides little direction on

how best to accommodate additional interior space. The purpose of the Master Plan Amendment is to remedy the planning issues summarized below.

Safety Concerns

Limited means of egress poses safety concerns for certain offices and program spaces. The electrical service is aging, providing insufficient power, with exposed electrical conduits and overused electrical branch circuits. Fire suppression systems are entirely lacking in the structure, placing it at risk of fire damage.

Collections Management

The NHS has a collection of over 14,500 objects, including over 5,000 original furnishings, books, and other domestic objects. Current curatorial storage conditions and exhibit areas do not meet NPS requirements for museum collections. The NHS lacks centralized or secured storage. In addition, the storage spaces are cramped, with collections stored in the attic in under-eave locations and in the basement with low headroom. No room exists for temporary collection storage.

Operations

The Ansley Wilcox House serves as the headquarters for the Foundation as well as its volunteers. Administration and other non-public spaces are interspersed with public spaces, interrupting visitor circulation to interpretive spaces.

To accomplish its mission, the Foundation hosts special events and other fund-raising opportunities at the NHS. The ability to host fund-raising activities is constrained by insufficient available space.

The area devoted to maintenance operations is insufficient, as is education storage space.

Visitor Use and Experience

The NHS lacks a large, dedicated education area. A 2nd floor multi-purpose room is used for most educational programs, but must compete with exhibits, visitors, other program functions, and meetings. The configuration of the multi-purpose room is awkward for certain uses due to the adjacent stair enclosure jutting into the space.

The NHS receives all visitors, including large groups, at the north entrance of the Wilcox House. This admissions area is confined and narrow, with insufficient interior waiting space.

The Foundation operates a gift shop that is located on the 2nd floor of the Wilcox House. The shop space is divided into two rooms, with one staff person presiding over its operation. In addition, the location of the gift shop is remote to the admissions and visitor entry/exit.

Access

Universal access to the Wilcox House is marginal: the lift is awkward to use, and is frequently non-functional; the portable ramp is inconvenient and awkward, and doesn't work for many wheelchairs and scooters.

Modern Intrusion on Historic Property

The .15-acre southwest corner of the historic Wilcox property is outside of the NHS boundary and contains a modern glass-and-concrete bank building. The modern building stands less than 15 feet from the south side of the Wilcox House, dominates the historic setting, and compromises the site's cultural landscape and visibility from Delaware Avenue.

SELECTED ACTION (PREFERRED ALTERNATIVE)

The Selected Action (preferred alternative, Alternative D) proposes to construct a new addition on the site of the former carriage house to provide for the needed additional 4,300 feet of interior space. The addition would be connected to the 1938 “infill area” of the Wilcox House (not fabric present in 1901). The new addition would be of similar massing and scale to the historic carriage house, but not an exact replica. Consistent with the *Secretary of the Interior’s Standards for the Treatment of Historic Properties*, the façades of the new addition would be compatible with the historic structure, but be of obviously modern construction.

The Master Plan Amendment also proposes to restore the boundary to its full extent at the time of the inauguration, should the adjacent .15-acre bank property become available in the future.

ALTERNATIVES CONSIDERED

The Master Plan Amendment evaluates six alternatives:

- Alternative A is the “no action” alternative, which serves as a baseline for evaluating other alternatives.
- Alternative B seeks to remedy the safety issues facing the NHS. It makes recommendations for changes to the existing available space, but provides for no additional interior space. It is a “minimal action” alternative that is based on recommendations made in a 1999 report by the architecture firm, Bargmann, Hendrie + Archetype, Inc.
- Alternative C proposes to acquire or lease an existing building outside of the NHS boundary to provide space for administrative and curatorial purposes.
- Alternative E proposes to construct a new addition to the Wilcox House to provide additional interior space. The addition would be connected to the east façade of the house, protruding toward the parking area. The new addition would be of similar materials and detailing to the Wilcox House, but be of obviously modern construction.
- Alternative F proposes to construct a new, stand-alone structure on property within the NHS, but outside of the 1901 property line. The new structure would provide space for visitor services, which would free up space in the Wilcox House for administrative and curatorial functions.

ENVIRONMENTALLY PREFERRED ALTERNATIVE

The Department of the Interior National Environmental Policy Act (NEPA) regulations 4.10(5) define the environmentally preferred alternative as “the alternative that will best promote the national environmental policy as expressed in NEPA’s section 101 and can be characterized as causing the least damage to the biological and physical environment and best protect, preserve, and enhance the nation’s historic, cultural, and natural resources.” The Council on Environmental Quality’s (CEQ) guidance defines it as “...the alternative that will promote the national environmental policy as expressed in NEPA’s Section 101. Ordinarily, this means the alternative that causes the least damage to the biological and physical environment; it also means the alternative which best protects, preserves, and enhances historic, cultural, and natural resources.”

After a review of potential impacts to historic resources, visitor use and experience, operations, and universal access, the team concluded that Alternative D best protects contributing resources, while enhancing public access to those resources.

Alternative D provides the required interior space in a way that is compatible with the cultural landscape. Because it returns the original massing and scale of the historic carriage house to the landscape, it provides visitors with an increased understanding of the appearance of the landscape during the period of significance. In contrast, Alternatives E and F provide the necessary additional space, but in ways that introduce modern intrusions into the landscape.

Alternative D assures operational efficiency by consolidating site operations in one structure. In contrast, alternatives C and F would have required the Foundation to operate two independent facilities, necessitating redundancies of equipment, services, and staffing. It also provides sufficient space for the Foundation events, as well as the maintenance operation.

Alternative D prevents loss of cultural resources by improving preservation and management of the collection through consolidating the artifacts into a centralized location, improving the security of the collection, and improving the environment in which the collection is exhibited and stored.

Alternative D provides sufficient space in the admissions area, locates the gift shop to be proximate to the visitor entry/exit, and significantly improves universal access. Alternative D assures a safe and aesthetically pleasing environment for future generations to experience the national historic site.

Both alternatives A and B did not provide sufficient interior space, and therefore did not fulfill the objectives of the plan amendment.

Based on the above, the team determined that Alternative D is the environmentally preferred alternative.

WHY THE SELECTED ACTION (PREFERRED ALTERNATIVE, ALTERNATIVE D) WILL HAVE NO SIGNIFICANT IMPACT ON THE HUMAN ENVIRONMENT

As defined by National Environmental Policy Act guidance, codified in 40 CFR §1508.27, significance is determined by examining the following criteria:

Impacts that may have both beneficial and adverse aspects and which on balance may be beneficial, but that may still have significant adverse impacts which require analysis in an environmental impact statement:

No major adverse or beneficial impacts associated with the Selected Action were identified that would require an analysis in an environmental impact statement.

The selected action will have no or negligible impacts on geology and topography; soils; water resources; air quality; vegetation and wildlife; threatened or endangered species; ethnographic resources; Indian trust resources; soundscape management; lightscape management; socio-economic environment; environmental justice; or transportation.

Major, positive, long-term impacts are expected on the collections, the historic setting, site operations, visitor use and experience, and universal access. Moderate, positive, long-term impacts are expected on visitor understanding of the historic scene and on universal access. Positive, but minor, long-term impacts are expected on the cultural landscape and historic structure. Negative, but minor, long-term impacts are expected on archeological resources, the historic circulation pattern, and the historic structure.

Degree of effect on public health or safety:

Implementation of the Selected Action will enhance public safety, as it will reduce the threat of fire and electrical system overload in the historic structure. Temporary impacts on the neighbors and staff due to construction activities will be mitigated through best practices. Construction activities will not be expected to appreciably contribute to air quality impacts already occurring in the area.

Unique characteristics of the geographic area such as proximity to historic or cultural resources, park lands, prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas:

The Selected Action will have no or negligible impacts on geology and topography; soils (including prime farmlands); water resources; air quality; vegetation and wildlife; threatened or endangered species;

ethnographic resources; Indian trust resources; soundscape management; lightscape management; socio-economic environment; environmental justice; or transportation. The NHS is not situated within an ecologically critical area or near a designated wild and scenic river.

The New York State Historic Preservation Office (SHPO) has expressed support for the Selected Action and will provide further comment as the design phase progresses. In addition, the SHPO has expressed no concern with the Selected Action regarding archeological resources.

Degree to which effects on the quality of the human environment are likely to be highly controversial:

No highly controversial effects were identified during preparation of the Environmental Assessment, nor commented on during the public review period.

Degree to which the possible effects on the quality of the human environment are highly uncertain or involve unique or unknown risks:

No highly uncertain, unique or unknown risks were identified during preparation of the Environmental Assessment or the public review period.

Degree to which the action may establish a precedent for future actions with significant effects or represents a decision in principle about a future consideration:

The Selected Action neither establishes a National Park Service precedent for future actions with significant effects nor represents a decision in principle about a future consideration.

Whether the action is related to other actions with individually insignificant but cumulatively significant impacts:

No significant cumulative impacts were identified during the preparation of the Environmental Assessment or the public review period.

Degree to which the action may adversely affect districts, sites, highways, structures, or objects listed on National Register of Historic Places (NRHP) or may cause loss or destruction of significant scientific, cultural, or historical resources:

No adverse impacts on districts, sites, highways, structures, or objects listed on National Register of Historic Places or loss or destruction of significant scientific, cultural, historical, or archeological resources within or outside of the NHS were identified during the preparation of the Environmental Assessment, nor commented on during the public review period.

As mentioned above, the New York SHPO has expressed support for the Selected Action and will provide further comment as the design phase progresses. In addition, the SHPO has expressed no concern with the Selected Action regarding archeological resources.

A representative of the Seneca Nation Tribal Historic Preservation Office identified no concerns about the project and stated via email correspondence that the Selected Action would have no effect on tribal resources.

Degree to which the action may adversely affect an endangered or threatened species or its critical habitat:

No federally or state-listed threatened or endangered species, or candidate species, are known to inhabit the Theodore Roosevelt Inaugural National Historic Site area or its general vicinity. In response to requests for information regarding potential impacts on wetlands and special status species, the U.S. Fish and Wildlife Service and the New York State Department of Environmental Conservation replied that no known rare species, wetlands, or critical habitat are known to exist in the project area or are expected to be impacted by the project activities.

Whether the action threatens a violation of federal, state, or local environmental protection law:

The Selected Action does not violate federal, state, or local environmental protection laws.

IMPAIRMENT OF PARK RESOURCES OR VALUES

During the study process, the study team consulted with the guidelines for Conservation Planning, Environmental Impact Analysis and Decision-Making (DO-12, effective January 8, 2001). DO-12 clarifies the National Park Service responsibilities under the Organic Act, which established the National Park Service in 1916, in regards to impairment of Site resources. Section 4.7 prohibits the National Park Service from taking or authorizing any action that would, or is likely to, impair Site resources or values. National Park Service Management Policies, 2001 Edition, Sections 1.4.1 through 1.4.7, set out the National Park Service definition of "impairment" and "park resources and values," and the National Park Service obligations in regard to preventing impairment.

In addition to reviewing the list of significance criteria, the National Park Service has determined that implementation of the Selected Action will not constitute an impairment of the Site's resources and values. This conclusion is based on a thorough analysis of the impacts described in the Environmental Assessment, the agency and public comments received, and the professional judgment of the decision-maker in accordance with the National Park Service's *Management Policies, 2001 Edition*, DO-2, DO-12 and DO-28. As described in the Environmental Assessment, implementation of the Selected Action will result in no adverse impacts to a resource or value whose conservation is (1) necessary to fulfill specific purposes identified in the establishing legislation or proclamation of Theodore Roosevelt Inaugural National Historic Site, (2) key to the natural or cultural integrity of the site or to opportunities for visitor enjoyment, or (3) identified as a goal in the park's general management plan or other relevant National Park Service planning documents.

PUBLIC INVOLVEMENT

Consultation and coordination with appropriate federal and state agencies were conducted throughout the preparation of the Master Plan Amendment. Regarding natural resource issues, the team consulted with the U.S. Fish and Wildlife Service and the New York State Department of Environmental Conservation regarding wetland and wildlife issues. Both agencies concluded that no wetland or wildlife issues were of concern regarding this planning effort. Regarding cultural resources, consultation with the New York SHPO was informally initiated on April 15, 2004 with an introduction to the planning effort. An advance copy of the draft Master Plan Amendment / Environmental Assessment was shared with the SHPO in March 2005 and a public draft of the Master Plan Amendment was submitted in May 2005. The SHPO has expressed no concern regarding the proposals put forth in the Selected Action, has suggested that site managers consider incorporating the carriage house foundation as a structural or interpretive element in the design of the new addition, and has committed to submitting formal comments after final design drawings are received.

Regarding historic properties of significance to Indian tribes, consultation with the Seneca Tribal Historic Preservation Office and the Tonawanda Seneca Nation Office was initiated by telephone on February 8, 2005. An advance copy of the draft Master Plan Amendment / Environmental Assessment was shared with the Seneca Nation in March 2005. A review copy was submitted to the Seneca Nation for formal comments during the public review period. A representative of the Seneca Nation Tribal Historic Preservation Office identified no concerns about the project and stated via email correspondence that the Selected Action would have no effect on tribal resources.

The planning team involved the site's primary partner, the Foundation, at all key stages of the planning process. The Foundation is composed of civic leaders and members of the larger Buffalo community from various backgrounds representing education, finance, community volunteers, site volunteers, law, architecture, construction, public relations, and development. The planning team

conducted the needs assessment and developed the alternatives in consultation with the site staff and Foundation Board members. In November 2004, the team presented the alternatives to the Foundation Board to solicit feedback. The Foundation Board was consulted again at a meeting in April 2005. In addition, the Superintendent has kept interested community institutions and organizations informed of the planning process through informal consultation.

In May 2005, Foundation mailed a letter inviting comment on the draft Master Plan Amendment / Environmental Assessment to 1,500 Foundation members, volunteers, friends of the NHS, media, officials, Congressional representatives, cultural institutions, and other interested parties. A complete draft of the Master Plan Amendment / Environmental Assessment was mailed or hand delivered to 35 parties, including NHS neighbors, the SHPO, the Seneca National, and various foundations and cultural institutions.

Two public meetings were held at the NHS on May 26 and 27, 2005. Although well publicized, both meetings were lightly attended. Attendees expressed support for Alternative D at both public meetings and comments largely focused on design considerations. Several attendees suggested that the design of the new addition be strongly influenced by the design of the original carriage house.

A total of 24 written or verbal comments were received during the public review period, including the telephone conversations with representatives of the New York SHPO and of the Seneca Nation. All of the comments received expressed support for the preferred alternative, now considered the Selected Action. No new information was submitted during the public review period that resulted in a modification to the preferred alternative (now the Selected Action), or that cause the team to reconsider or modify its analysis.

FINDING OF NO SIGNIFICANT IMPACT

The Selected Action (preferred alternative), under this Finding of No Significant Impact, does not constitute an action that normally requires preparation of an environmental impact statement. The Selected Action will not have a significant effect on the quality of the human environment. Adverse environmental impacts that could occur are negligible to minor in intensity. Mitigation measures will be incorporated into the Selected Action to reduce or eliminate impacts. There are no significant adverse impacts on public health, public safety, or threatened or endangered species, historic properties either listed in or eligible for listing in the National Register of Historic Places, or other unique characteristics of the region. The New York SHPO has provided concurrence at the concept level and will continue to provide comment as the design development phase proceeds. Implementation will proceed only with New York SHPO concurrence on the final design.

No highly uncertain or controversial impacts, unique or unknown risks or significant cumulative effects, or elements or precedence were identified. Implementation of the Selected Action will not violate any federal, state, or local environmental protection law. Implementation of the Selected Action will have no significant impact on the quality of the human environment.

Based on the foregoing, it has been determined that an environmental impact statement is not required for the Master Plan Amendment and, thus, will not be prepared.

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| Recommended: | <u>signed</u> | <u>6/21/05</u> |
| | Molly Quackenbush | Date |
| | Superintendent / Executive Director | |
| | Theodore Roosevelt Inaugural National Historic Site | |

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| Approved: | <u>signed</u> | <u>6/27/05</u> |
| | John Maounis for | Date |
| | Mary Bomar | |
| | Acting Regional Director | |
| | Northeast Region | |

References:

THRI Master Plan Amendment/Environmental Assessment, May 2005

Agency Consultation and Responses (All favorable-none opposed):

U.S. Fish and Wildlife Service, Cortland, NY to M. Smith, NPS, 2005
NY State Department of Environmental Conservation to M. Smith, NPS, 2005
NY State Office of Parks, Recreation & Historic Preservation, Office of the
State Historic Preservation Officer, via E-mail 6/8/05 R. Lord, to M. Quackenbush,
NPS Superintendent, THRI
Seneca Nation Tribal Historic Preservation Office, Salamanca, NY via E-mail 5/16/05
to M. Quackenbush, NPS Superintendent, THRI

Public Responses to EA Review (All favorable-none opposed):

Voiced in public meetings, written to Superintendent, or voiced by telephone, total 24